

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

HARTFORD LIFE AND ACCIDENT \*  
INSURANCE COMPANY,  
*Plaintiff-in-Interpleader* \*

C.A. NO. 4:23-cv-549

v. \*  
.

JURY TRIAL DEMANDED

LOURINE DAVIS-COOK, and \*  
JACLYN DAVIS  
*Interpleader-Defendants*

**DEFENDANT LOURINE DAVIS-COOK ANSWER TO  
HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY  
COMPLAINT IN INTERPLEADER**

**TO THE HONORABLE KENNETH HOYT,  
UNITED STATES DISTRICT JUDGE:**

Defendant LOURINE DAVIS-COOK by and through her undersigned counsel, files this Answer to the Complaint in Interpleader filed by HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY and would show as follows:

1. Defendant admits to paragraphs 1 through 12.
2. Defendant admits in part to paragraph 13, but denies Mr. Davis was not competent to change beneficiaries and asserts that he was competent in changing beneficiaries under the policy.
3. Defendant admits paragraph 16.
4. Defendant lacks knowledge or information sufficient to form a belief

about the truth of the allegation in paragraphs 17 and 18.

5. Defendant admits to paragraphs 19.

6. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegation in paragraphs 20 and 21.

7. Defendant hereby request a trial by jury

**WHEREFORE**, Defendant Lourine Cook-Davis request the Court:

a. Enter judgment and Order awarding one hundred percent (100%) of amounts and funds interplead or to be interplead by Hartford under the policy, that is placed or will be placed into the registry of the Court to Defendant Lourine Cook-Davis and her counsel of record.

b. Award pre- and post-judgment interest;

c. Award costs of court; and

d. Grant such other and further relief as appears reasonable and just, to which Defendant Lourine Cook-Davis show she is justly entitled both legal and equitable.

RESPECTFULLY SUBMITTED,

/s/ **Otha T. Carpenter**

OTHA T. CARPENTER, ESQ.

Attorney at Law

20333 Hwy 249, Ste 200

Houston, TX 77070

713-227-2833 Office

SBN: 03847500

Attorney for Plaintiff

[saxofpraise@aol.com](mailto:saxofpraise@aol.com)

ATTORNEY IN CHARGE

FOR LOURINE DAVIS-COOK

**Certificate of Service**

I hereby certify that on March 14, 2023, a true and correct copy of the foregoing Answer to Hartford Life and Accident Insurance Company's Complaint in Interpleader was served pursuant to the Federal Rules of Civil Procedure via the Court's CM/ECF.

Linda P. Wills

Wilson, Elser, Moskowitz,

Edelman & Dicker, LLP

SBN: 21661400

909 Fannin St., Ste 3300

Houston, TX 77010

713-353-2000

[Linda.wills@wilsonelser.com](mailto:Linda.wills@wilsonelser.com)